



INTERNAL AUDIT REPORT SCHOOLS RECORDS MANAGEMENT



April 12, 2005

Roanoke City School Board Audit Committee
Roanoke, Virginia

We have completed our audit of the Roanoke City Public Schools records management program. Our audit was performed in accordance with generally accepted government auditing standards.

BACKGROUND

In Section 42.1-76, the General Assembly of the State of Virginia established a single body of law applicable to all public officers and employees on the subject of public records management and preservation. The law was designed to ensure that the procedures used to manage and preserve public records would be uniform throughout the Commonwealth. This is known as the Virginia Public Records Act.

Section 42.1-79 of the Code of Virginia states the records management function is vested in the State Library Board. The duties and powers of the Board are to issue regulations to facilitate the creation, preservation, storage, filing, reformatting, management, and destruction of public records by all agencies. The regulations include recommendations for the retention and final disposition of public records. They also establish standards for the reproduction of records by photocopy or microphotocopy processes. School districts in Virginia must adhere to Schedule No. 21 of the Library of Virginia, Records Retention and Disposition Schedule. Additionally, school districts must comply with the Family Educational Rights and Privacy Act of 1974 that provides for parental access to their student's educational records.

Each state agency and political subdivision of the Commonwealth must designate at least one records officer to serve as liaison to the Library of Virginia for the purpose of implementing and overseeing a records management program. Roanoke City Public Schools has designated Dennis Frye, Library/Media Coordinator, and Lou Talbutt, Executive Director for Student Services, as Records Officers.

In his role as Records Officer, Mr. Frye was given the task of improving the district's management of inactive student records stored centrally in the School Administration Building. Records at the individual schools and in the individual departments have

continued to be managed by employees in those schools and departments, with Mr. Frye providing advice as situations arise and as time allows.

SCOPE

Our audit focused on processes in place as of October 31, 2004, in the School Administration Building's Central Records area. Our audit encompassed only the management of inactive student records transferred to the Central Records area. This audit did not address records management at the individual schools. It also did not address records management in the Administrative, Transportation, Food Services, Building and Operations areas.

OBJECTIVES

The objective of this audit was to determine if the design and operation of the system of internal controls is adequate to ensure former student records are managed in accordance with state law.

METHODOLOGY

We gained an understanding of the records management process by reviewing existing written policies and procedures, and by interviewing and observing the staff. We documented the processes and considered the significant risks related to records management. We evaluated the adequacy of the controls designed to mitigate those risks and developed tests to evaluate adherence to the procedures we identified as important mitigating controls. We also designed tests to evaluate the school system's level of compliance with certain provisions of state law.

Specifically, these tests included the following:

- Compared the printout of year 2000 graduates from Pentamation, the student information system, to the summary list received from the high schools
- Conducted a random sampling of year 1999 graduates' cumulative records in the files compared to the printout from Pentamation
- Tested the transcript requests for calendar year 2004 to determine the number of requests that were logged, fulfilled, not fulfilled, and how many records could not be found
- Conducted a random sampling of year 1996 graduates' cumulative files to determine if they contained long-term documentation as specified by the Library of Virginia, Records Retention and Disposition Schedule, Schedule No. 21
- Tested to determine if Central Administration collects transcript fees and how much was collected between July 1, 2003 and February 11, 2005.

RESULTS**Finding 01 – Short-Term Documentation**

The Library of Virginia (LVA), Records Retention and Disposition Schedule, General Schedule No. 21, states that the shorter-term portion of an individual student's cumulative record should be retained five (5) years after the student graduates, completes Board of Education program, transfers, or withdraws from school, then destroyed in compliance with LVA guidelines, which is normally done by shredding or pulping, or the "wiping" clean of electronic records.

During our audit, we determined the following short-term documentation had not been purged from the students' cumulative records:

- William Fleming High School and Patrick Henry High School graduates 1997 thru 1999
- William Fleming High School drops 1991 thru 1999 and Patrick Henry High School drops 1997 thru 1999
- Middle school drops from 1918 thru 1999

This creates additional space needs due to the space required to store these paper records. The required information, once copied onto microfilm, would occupy significantly less space than its paper equivalent.

There has not been adequate staffing and funding in the central records area to provide for timely purging and microfilming of student records. The necessary organizational structure has not been in place to enable someone to develop and advocate proper funding. The job description for the Library/Media Coordinator does not specify any authority or responsibilities to plan the records management function, supervise records staff, or propose budgets. The Library/Media Coordinator serves as the system's designated Records Officer but has not been given any authority to develop and adopt records policy for the district. The records area does not have a formal mission statement, stated goals and objectives, or other departmental components that provide direction and purpose. There are insufficient written, detailed procedures for managing student records.

Action Plan 01 – Short-Term Documentation

Schools records management agrees there is a backlog of student records that needs to be purged and microfilmed. Due to limited staffing and funding, these processes have been delayed. There is currently a set of student records that have been purged and are ready for microfilming, but there is no funding to complete this phase of the project. The immediate priority has been to focus on the management of pre-electronic high school graduate records, which is the area of greatest need.

The school administration agrees that there should be a more formal recognition of the

Records Management department. Funding was proposed in a 2005-06 budget decision package, however; other priorities ranked higher and funding for records was not allocated. The administration will develop a job description for a "Director" position responsible for records or information management. A decision package for the 2006-07 budget that includes high priority funding for the records management function will be developed.

Finding 02 –Records Stored in the Warehouse

The Code of Virginia, Section 42.1-87, requires records to be stored in fire resistant, environmentally controlled, physically secure areas designed to ensure proper preservation and in such arrangement as to be easily accessible.

The Library of Virginia Public Records Management Manual, Chapter 10, states that heating and cooling systems should maintain temperature between 65 and 70 degrees. Fire systems should at a minimum include smoke alarms and water sprinklers.

Inactive student records for several elementary schools are stored in the Roanoke City Public Schools warehouse located off 9th Street, SE. There are also school census records from the 1930s through the 1960s, as well as other administrative records such as personnel files from Human Resources. The temperature in the warehouse ranges from 65 degrees Fahrenheit in the winter to 88 degrees in the summer. The warehouse does not have humidity controls or fire suppression systems. In September 2004, about 15 inches of water entered the warehouse during a flooding event, exposing some of the records to water damage.

The records stored in the warehouse are at risk of deteriorating prematurely and may be unreadable before the Library of Virginia schedules provide for the records to be destroyed. The warehouse was designated as a temporary storage area for records in order to address the challenges individual schools and departments were having with regard to storage space. Again, there has been no central planning for the school system's current and future needs for records storage space. As part of the school administration's long-range planning for records management, it should evaluate facility and equipment needs specifically for processing, storing, and managing all archival type records in the school system.

Action Plan 02 – Records Stored in the Warehouse

Records management agrees that these records should be stored in a fire resistant, environmentally controlled, and physically secure area in order to provide proper preservation and accessibility. Records management and other school administrators have discussed this issue and recognized the need to relocate these records. The authority and funding necessary to address the issue has never been developed and approved. Establishing a central records management department and budget should provide the means to develop a long-range plan for records management that will address the need for safe and appropriate storage areas for all records.

Finding 03 –Former Student Records at Individual Schools

Roanoke City School Board Policy Manual, Section JO-R, states that records for all former students are located at the Central Office under the custodianship of the Records Manager. However, records of former students are retained by the high schools for three to five years following graduation or withdrawal. The records of former students who withdrew from elementary and middle schools are retained by those schools for varying time periods. As a result, some former student records are not located at the place designated by Board policy. This creates confusion as to where former students are to request copies of their records. It also increases the school system's risks related to proper storage and management of those inactive records since it creates 34 additional repositories for records. Each location will have its own issues in trying to comply with the standards for safeguarding and protecting these records. Schools have been required to retain inactive student records due to having inadequate resources in the central records area to process and store all former student records.

The goal of consolidating all former student records at one location should be evaluated as part of the future overall plan for records management. Addressing environmental and security controls at one location is more cost effective than attempting to address those issues at 34 locations. A centralized agency enhances the system's ability to have staff specifically trained in records management and ensure compliance with the various laws and regulations.

Action Plan 03 – Former Student Records at Individual Schools

Schools records management will evaluate a plan for locating all former student records in one location. Management will also address the need for long-range planning and development of the records management function. This will include communicating with the individual schools regarding the contents of student records and will also provide the assignment of authority needed for adequate response to these issues.

Finding 04 – Charge for Transcripts and Individual Education Plans

The Roanoke City School Board Policy Manual, Section JO, provides that Roanoke City Public Schools (RCPS) shall not charge for the costs of searching and retrieving student records. It provides that the first transcript for an enrolled student is free and each additional copy is \$1. Following graduation, each copy of a transcript is \$2. The RCPS shall not charge a fee for copying an Individual Education Plan (IEP).

Currently, the records staff charges \$5 for the first transcript and \$2 for each subsequent copy. Of 1,470 requests for transcripts received in calendar year 2004, there were 37 (2.5%) requests that were not fulfilled because the requestor did not respond to requests for payment. There is no charge for IEPs totaling nine sheets or less; however, a charge of \$1 is assessed for ten sheets plus \$.10 for each additional sheet provided.

The expense incurred by RCPS to administer the fee for transcripts likely exceeds the

revenue generated by the fee. In the fiscal year ended June 20, 2004, the fees collected by the school system as a whole for transcripts totaled \$5,110. As of February 11, 2005, \$2,958 had been collected in the current fiscal year 2005.

The school administration should evaluate eliminating fees for copies of records. This would allow the staff to more quickly process requests since those personnel would not have to place requests in a holding file, prepare and mail notices requesting payment (up to three notices). It would also relieve the staff from responsibilities for collecting cash and would eliminate the need for businesses, colleges, and individuals to print \$2 checks. To reduce costs, the school system should develop a process for printing requests directly from Pentamation and providing transcripts via e-mail.

Alternatively, a fee structure could be developed to more adequately cover the school system's expenses, perhaps charging \$10 for the first transcript and \$2 for each additional copy.

Action Plan 04 – Charge for Transcripts and Individual Education Plans

Schools records management proposes to explore the options for eliminating fees for the first six copies per visit. Additional copies will be charged a \$2 fee per copy. Records management further agrees to promote the use of the Pentamation system in printing transcripts. There is concern with the security of e-mailing transcripts. However, this will be feasible when a secure system becomes available to deliver the electronic document, verify the identity of the requestor, and provide proof that disclosure has been granted by the former student.

Finding 05 – Notifications to Special Education Students

The Guidelines for the Management of the Student's Scholastic Record in the Public Schools of Virginia, May 2004, Part VII (p18), published by the Virginia Department of Education states, "The local educational agency's policies should provide all parents and eligible students the opportunity to obtain their scholastic records prior to destruction. Notification of records destruction can be provided in the local newspaper or by some other means."

The Special Education Transcript Clerk mails a notice to the last known address of each former special education student whose file is scheduled for destruction. There is significant time and expense in preparing this mailing. Associated risks include that notification won't be received if the person/family has moved from the last known address, or that a student's name and status as a former special education student would be revealed to unrelated persons who might be living at the student's last known address.

Municipal Auditing recommends that a notification procedure be incorporated into the Records Management department's future policy and procedures manual. The procedure should require that a standard notice be posted each year in the Roanoke Times and the Roanoke Tribune just prior to the expiration of the five year threshold for purging

documents. Notices should not be mailed to individual households.

Action Plan 05 – Notifications to Special Education Students

Schools records management concurs with the above recommendation to publish a notice in the Roanoke Times and the Roanoke Tribune regarding the expiration of the five year threshold for purging documents. Additionally, notification will be provided on the school's Web site.

Finding 06 – Duplicates of Microfilm Are Not Stored Off-Site

According to the *Virginia Public Records Management Manual (January 2000)*, duplicates of vital records, where practical, should be stored for security purposes at a secure, off-site location. Currently, the master copies of microfilm are kept in the storage vault at Central Administration, which is where the working copies (duplicates) are also kept. A disaster that might occur at the central records office would affect both the copy and master films.

Although there has been inadequate organizational structure to provide records management personnel adequate time and funding to fully address issues of disaster planning, it is necessary to cover some of the basic priorities. It is recommended that the master copies of the microfilm of student records be stored off-site in an environmentally safe location.

Action Plan 06 – Duplicates of Microfilm Are Not Stored Off-Site

Schools records management agrees to the recommendation and will store the masters or the best condition non-working copy of the microfilm off-site at the Library of Virginia in an environmentally controlled and safe location. Work has been progressing towards this goal for some time. The microfilm had to be thoroughly checked given the legacy issues with duplicate records prior to determining master and duplicate copies. Not all copies have silver halide masters. Additionally, work had to be done to lighten the copies for display on the microfilm reader.

Finding 07 – Long-Term Documentation

The Library of Virginia (LVA), Records Retention and Disposition Schedule, Schedule No. 21, specifies 16 types of documents or information that should be retained in a student's cumulative file for 75 years. These include student name and address, the student's social security number or identification number, his or her birth date, the name and address of the student's parent or guardian, the attendance record, the program of studies plan, the scholastic work completed, his or her grades, GPA, class rank, literacy test scores, achievement test scores, the type of diploma awarded, the immunization certification, and the student's citizenship status.

In order to determine if the appropriate records are retained through the purging process,

we selected a random sample of student cumulative files to review. The student records from the class of 1996 were the most recently purged files and were used for our test. Students were selected from both William Fleming and Patrick Henry High Schools. We noted the following based on the 25 student files tested:

- Three (3) files did not have a complete attendance record
- Three (3) files did not have a complete record of the students' grades
- Two (2) files had no score listed for the literacy testing program

The document on which grade and attendance data should have been documented was, in fact, in the files reviewed; however, the data was not recorded on the document.

The LVA stated that the "program of studies plan" should document the course of study chosen by the student in his/her meetings with the Guidance Counselor. Neither the Virginia Department of Education document entitled, "Guidelines for Managing the Student Scholastic Record," nor the Superintendent's Memo outlining the content requirements of the student transcript (Jan. 2002 #10) list the "program of studies plan" as a required component of the student record. In 1996, Roanoke City Public Schools was not documenting a program of studies plan. As such, there was no such plan in the 1996 records we reviewed. In 2003, the Guidance department began requiring Guidance Counselors to review with students the course work completed and remaining to be completed in order for the student to earn his or her desired diploma. This review is documented and signed by both the counselor and student. This record will need to be retained as part of the student's cumulative file in the future.

Similarly, schools records management staff informed Municipal Auditing that the Virginia Department of Education did not require the "type of diploma" to be recorded as part of the transcript in 1996. However, the school system does currently award various types of diplomas which are documented in the students' records on the Pentamation system. Diploma type should be included as part of the long-term record for students going forward.

Action Plan 07 – Long-Term Documentation

The Guidance department currently manages the content of the active student record. There has not been any centralized responsibility or authority assigned to address the need for standard, consistent information development and retention. The most effective means of addressing the issue raised by the audit, from a records management perspective, would be to create a position of authority over the management of this type of data. This will be advocated in setting up a formal records management department. Additionally, records management will advocate the need for consistent and clearly communicated requirements between the Library of Virginia and the Virginia Department of Education on expectations for the management of the student record.

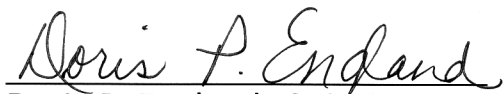
We noted other issues over the course of the audit that we shared with the Library/

Media Coordinator during the closing conference. Those issues did not rise to the level of reportable findings and did not require formal management responses. We were pleased with both the openness of our discussions with the Library/Media Coordinator and his response to the issues that were raised.

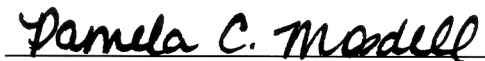
CONCLUSION

Based on the results of our audit work, we conclude that the design and operation of the system of internal controls is not adequate to ensure former student records are managed in accordance with state law.

We would like to recognize the substantial efforts undertaken by the Library/Media Coordinator and records staff to address past and present issues in the records area and to acknowledge the significant progress that has been made in recent years. We would also like to thank the Library/Media Coordinator and the records staff for their cooperation and assistance throughout the audit.



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INTEROFFICE MEMORANDUM

TO: DREW HARMON – MUNICIPAL AUDITOR
FROM: DENNIS M. FRYE, LIBRARY/MEDIA COORDINATOR RCPS
SUBJECT: MANAGEMENT COMMENTS
DATE: 3/28/2005
CC: LOU TALBUTT, DICK CLEMMER, WARREN CRAWFORD, PHYLLIS CUNDIFF, DAVID BAKER

The recent audit of student records points out several symptoms related to the need for a renewed comprehensive focus on our records across the district. Basically, there is much work to be done and that work needs direction and leadership that is centralized. At best, we have been operating as a group of independent areas which manage files, information, data, and records individually. School site and department leaders need a source of leadership and support that can direct them in proper records management and which can find cost efficiencies for overall management of all school information: files, records, data, etc. Additionally, there needs to be a level of support that corrects other records issues that are currently outstanding. In my estimation, a more formal approach, a higher level of authority, and stronger commitment of financial resources for managing records needs to be established.

The primary concern is still the need for a renewed appreciation for the value of properly maintaining records district-wide. The issue goes beyond just basic record keeping in files. There are some departments which have the proper procedural guidance that is not being followed. We have data in computer databases which attempts to mirror print files. In some instances, we have duplicate print copy which does not match 100% with the original. All of these disparate sources of information need to be aligned under consistent procedures and thorough policies. Moreover, recent changes in our society have caused the issues related to the handling of human information more pertinent.

Finally, there needs to be a committed decision to the establishment of a level of sustainable compliance. We need to have strategic planning which makes use of cost analysis, goal setting, and evaluation aimed at reaching this level. Furthermore, in order for us to maintain a level of compliance there needs to be

a schedule of internal school district auditing that documents and polices compliance.

My recommendation is that we commit ourselves to making real, substantial changes. These should be aimed at setting strategic goals that address process issues rather than isolated incidents. We need to respond creatively and proactively to issues that are symptoms of a larger matter: the lack of centralized, focused district leadership for all school information and data.